

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure)	
Compatibility with Enhanced 911)	
Emergency)	
Calling Systems)	WT Docket No. 01-309
)	
Section 68.4(a) of the Commission's)	
Rules)	WT Docket No. 03-264
Governing Hearing Aid-Compatible)	
Telephones)	
)	
Biennial Regulatory Review –)	
Amendment of Parts 1, 22, 24, 27, and)	WT Docket No. 06-169
90 to Streamline and Harmonize)	
Various Rules Affecting Wireless Radio)	
Services)	
)	
Former Nextel)	PS Docket No. 06-229
Communications, Inc. Upper)	
700 MHz Guard Band Licenses)	
and Revisions to Part 27 of the)	
Commission's Rules)	WT Docket No. 96-86
)	
Implementing a Nationwide,)	
Broadband, Interoperable)	
Public Safety Network in the)	
700 MHz Band)	
)	
Development of Operational, Technical		
and Spectrum Requirements for		
Meeting Federal, State and Local Public		
Safety Communications Requirements		
Through the Year 2010		

COMMENTS OF MIKE JEFFRES, CHAIR

NEBRASKA 700 MHZ REGIONAL PLANNING COMMITTEE

Mike Jeffres hereby submits these reply comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

These comments are concerning the Commission's April 25 adoption of a Further Notice of Proposed Rulemaking (FNPRM) addressing issues related to both the public safety and commercial 700 MHz spectrum.

The Commission had tentatively concluded that the current public safety data spectrum which had been identified for wideband use should be used to support broadband operations in conformance to a national standard. As chair of Region 26 Nebraska 700 MHz RPC, Region 26 supports this conclusion for broadband capability, but we also recognize the need for flexibility within each RPC to determine its own course of action on this. It should not be a foregone conclusion the outcome of a national approach to this issue. However, we affirm the fact that public safety does not have the means to implement such a broadband infrastructure. We also recommend proof of delivery of services as determined by the emerging needs of RPCs.

Although the Commission is concerned with hindrances to deployment of a nationwide broadband network, the Commission should also recognize the need for state and local control of interoperability issues. Broadband developments will likely emerge in the form of a few standards, which should be driven by the need for nationwide access to interoperable capabilities for voice and data. State and local investment in these capabilities must be supported by the fact that interoperability is less a mandate, and more a desire and need. Technical mandates can only serve to counter the intent of public safety agencies to move forward deliberately with interoperable planning and conformance to operational standards as their needs determine.

This is certainly a long-term national interest, and technologies will continue to evolve as public safety agencies mature in their operational practices across the nation. Current technologies are deployed over much of the nation, although large rural areas remain without these commercial wireless services. Such issues must be addressed within RPCs, as it is in their interest to best serve their entire population, not only urban settings. There is clearly a need to negotiate appropriate and scalable systems to meet these needs as well. In addition, there are a variety of technologies now, and certainly in the future, that could address rural needs

regardless of a national mandate. However, this may not take the form desired by the Commission at present.

There is clearly an interest within RPCs across the nation, and within the Commission, to recognize the need for broadband initiatives that preserve public safety RPC decision making roles. Region 26 Nebraska maintains an interest in providing additional comments to the Commission for the purpose of sound spectrum planning and evolving technology issues for the good of public safety.

Respectfully,

Mike Jeffres

State of Nebraska

May 22, 2007